## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DANIEL RIVERA, STEPHEN KENSINGER,	)	
DEBORAH JO MEACOCK, and REBECCA	)	
SCHEUNEMAN,	)	
	)	Case No. 10 cv 1733
Plaintiffs,	)	
	)	Hon. Judge John F. Grady
V.	)	
	)	
ALLSTATE INSURANCE COMPANY, and	)	
JUDY GREFFIN,	)	
	)	
Defendants.	)	

## STIPULATED PROPOSED ORDER TO PRODUCE CERTAIN PRIVILEGED DOCUMENTS

This Court hereby enters the following Stipulated Proposed Order To Produce Certain Privileged Documents. The parties have come to an agreement as to the production of certain documents believed by Allstate to be privileged. Pursuant to the parties' agreement, Defendant Allstate Insurance Company ("Allstate") will produce final reports or other documents identifying Allstate's determination/calculation of \$1.2 Million in overpaid bonuses under Allstate's Pay-for-Performance Plan. Allstate will produce such documents by March 8, 2013, unless otherwise agreed to by the parties. Such documents will be treated as "Confidential." Pursuant to Federal Rule of Evidence 502, Allstate's voluntary disclosure of the agreed upon documents does not constitute a subject matter waiver of its attorney-client privilege or work-product protection as to the agreed upon documents or any other undisclosed documents.

Dated: March , 2013

It is hereby Ordered: